

# **EXHIBIT 151**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,  
MASSACHUSETTS,  
WASHINGTON, COLORADO,  
CONNECTICUT, DELAWARE,  
DISTRICT OF COLUMBIA,  
HAWAII, ILLINOIS, IOWA, NEW  
MEXICO, NORTH CAROLINA,  
OREGON, PENNSYLVANIA,  
RHODE ISLAND, VERMONT, and  
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; ELAINE C. DUKE, in her official capacity; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; and the UNITED STATES OF AMERICA,

CIVIL ACTION NO. 1:17-cv-05228  
(NGG) (JO)

Defendants.

DECLARATION OF DR. PAUL ROTH, M.D., M.S

Pursuant to 28 U.S.C. Sec. 1746, I hereby declare:

1. I am over the age of 18 and competent to testify.

2. I am the Executive Vice President and Chancellor of the University of New Mexico

Health Sciences Center (UNMHSC), the Dean of the University of New Mexico School of Medicine and Chief Executive Officer of the University of New Mexico Health Sciences Center.

3. The UNMHSC employs a total of approximately 8000 individuals, including professional and support staff, and its colleges and schools have an average enrollment totaling 1,966 students, some of whom may be participants in the Deferred Action for Childhood Arrivals (DACA) program. .

4. The Academic programs within the UNMHSC include the College of Nursing, College of Pharmacy, College of Population Health, School of Medicine, and Biomedical Education Research Program.

5. I graduated from George Washington University School of Medicine in 1976 and completed my family practice residency in 1979 at the UNM School of Medicine. I completed a BS in 1969 and an MS in biology in 1972, both at Fairleigh Dickinson University.

6. I am a member of the Liaison Committee on Medical Education, which accredits all U.S. and Canadian medical schools and am a board member of the Association of Academic Health Centers, whose Administrative Board I previously chaired, and a board member of the Association of Academic Health Centers.

7. I have served on the United States Department of Health and Human Services' Public Health Emergency Advisory Council, and was a member of the joint Department of Homeland Security and Department of State "Secure Borders/Open Doors" advisory committee, as well as the Transition Task Force for Homeland Security during the President George W. Bush administration.

8. I am a board member and past chair of the Greater Albuquerque Chamber of Commerce.

9. I also founded the UNM Center of Disaster Medicine and created the nation's first Disaster Medical Assistance Team.

10. I was a founder of UNM's emergency medicine residency program, past chair of the Department of Emergency Medicine, a fellow in the American College of Emergency Physicians, and served as chair of the Association of American Medical Colleges Council of Deans.

11. I oversee four health professional colleges (Medicine, Nursing, Pharmacy and Population Health) and the UNM Health System (UNM Hospitals, UNM Medical Group, Inc., and UNM Sandoval Regional Medical Center). The UNM Health System is New Mexico's largest referral center for complex injuries and diseases and includes the region's only Level I trauma center.

12. The UNM Health Sciences Center is the single most important training ground for New Mexico's physicians, nurses, pharmacists, and other health professionals, some of whom may work and attend classes as beneficiaries of DACA.

13. The students, faculty and staff who make up the UNMHSC are among our best and brightest. They bring both talent and dedication to the improved health of New Mexico's largely rural and underserved areas.

14. With the contemplated changes to DACA, a DACA student currently enrolled in a four-year or six-year medical program would have to weigh the benefits of continued education and clinical experience against the potential for deportation.

15. In my roles with the Health Sciences Center, I have had the pleasure of knowing UNM students and graduates who are DACA recipients. These individuals are part of a cohort of students who have expressed their commitment to practicing as medical professionals in remote areas of New Mexico, where finding medical care is sometimes challenging.

16. New Mexico's population benefits from the training and expertise of all of our students, including DACA recipients; they provide significant health gains, services, and care for New Mexico residents whose medical needs are most complex.

17. I declare under penalty of perjury that the foregoing is true and correct.



Paul Roth, M.D., M.S.

Executive Vice President and Chancellor for Health Sciences,  
Chief Executive Officer, UNM Health System,  
Dean, School of Medicine  
University of New Mexico Health Sciences Center  
1117 Stanford NE  
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Dated This 26<sup>th</sup> of September, 2017